

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

**CARLOS A GARCIA -PEREZ, ET AL.**

Plaintiffs

v.

**ALVARO SANTAELLA, ET AL.**

Defendants

CIVIL NO. 97-1703(JAG)

**MOTION FOR EXTENSION OF TIME TO OPPOSE  
PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

**TO THE HONORABLE COURT:**

Comes now the Insurers Syndicate for the Joint Underwriting of Medic-Hospital Liability Insurance (“SIMED”), through the undersigned attorneys, and respectfully states and requests as follows:

1. On April 5, 2005 the plaintiffs filed a motion for partial summary judgment moving the Court to determine the applicable limits of liability applicable under different insurance policies involved in this litigation. The opposition to said motion should be filed by April 29,2005.

2. The undersigned attorneys have been studying the legal issues raised on plaintiffs' motion, but the opposition to such motion is not ready yet to be filed. To conclude such drafting the undersigned will need an additional term of fifteen (15) days. The undersigned has discussed this request with counsel for the plaintiffs, Mr. Andrés Guillemard-Noble, who stated that the plaintiffs have no objection to this request and who authorized the undersigned to so advise the court.

3. In addition, in the last weeks the undersigned has commenced a discussion and evaluation process with representatives of other insurance carriers parties to this case looking for an extrajudicial solution to the instant case. These efforts will receive further attention from the

undersigned during the following weeks with an eye on getting to a settlement in this case. Since trying to get to a settlement is a priority in the instant case, the parties efforts should be addressed to reaching a settlement. Thus, SIMED's request for additional time will also contribute to promote settlement discussions.

WHEREFORE, it is respectfully requested from this Honorable Court to grant SIMED an extension of time of fifteen (15) days, until May 16, 2005, to file its opposition to plaintiffs motion for partial summary judgment.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on April 29, 2005.

I HEREBY CERTIFY: That copy of this motion will be served through the ECF/CM system on the following attorneys participants in the system: Pedro J. Cordova-Pelegrina; Gilda Del C. Cruz-Martino; Angel R. De-Corral-Julia; Igor Dominguez-Perez; Andres Guillemard-Noble; Isabel M. Guillen-Bermudez; Jeannette M. Lopez; Alexis D. Mattei-Barrios; Raphael Pena-Ramon; Doris Quinones-Tridas; Ricardo L. Rodriguez-Padilla; Roberto E. Ruiz-Comas; Joan Schlump-Peters; Jaime Sifre-Rodriguez; Pedro Toledo-Gonzalez; Marta E. Vila-Baez; Luis V. Villares-Sarmiento; Jose H. Vivas

/s/  
**JOSE L. GONZALEZ CASTAÑER**  
**USDC-PR No. 201905**  
jlgc@microjuris.com

**GONZALEZ CASTAÑER, MORALES  
& GUZMAN, C.S.P.**  
WesternBank World Plaza  
Suite 1500  
268 Muñoz Rivera Ave.  
Hato Rey, Puerto Rico 00918  
TEL. 758-7819 / FAX 758-4152